

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA : SEALED INFORMATION
:
- v. - : 16 Cr. 832
:
JOHN DOE, :
:
Defendant. :
:
----- X

COUNT ONE

The United States Attorney charges:

1. From at least in or about December 2015, up to and including in or about April 2016, in the Southern District of New York and elsewhere, JOHN DOE, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JOHN DOE, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that JOHN DOE, the defendant, conspired to distribute and possess with the intent to distribute was 5 kilograms and more of mixtures and substances

containing a detectable amount of cocaine, in violation of 21
U.S.C. § 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

Preet Bharara
PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(21 U.S.C. § 846.)

PREET BHARARA
United States Attorney
